

# **Exhibit 1 to MIL 8**

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE**

**JOHN RUFFINO and MARTHA RUFFINO,** )  
**Husband and Wife,** )

**Plaintiffs,** )

**v.** )

**DR. CLARK ARCHER and HCA HEALTH** )  
**SERVICES OF TENNESSEE, INC. d/b/a** )  
**STONECREST MEDICAL CENTER,** )

**Defendants.** )

**Civil Action No.: 3:17-cv-00725**

**Jury Demand**

**Judge Waverly D. Crenshaw**

**Magistrate Judge Alistair Newbern**

**THE PLAINTIFFS' RULE 26(a)(1) DISCLOSURES**

**Rule 26(a)(1)(i) Disclosures**

In addition to the Plaintiffs having knowledge regarding the facts and claims in this lawsuit, the Plaintiffs disclose the following persons who have discoverable information on the noted subject matters:

Mark Ruffino, who is John Ruffino's brother  
DBIA Vice President & General Manager – Federal Contracting Group  
20085 Cottage Wood Avenue  
Deephaven, MN 55331  
(612) 749-5195

Brian Ruffino, who is John Ruffino's brother  
1581 E. Silver Summit Drive  
Fresno, CA 93730  
(559) 289-2245

Mark and Brian were familiar with John's condition via personal contact prior to the stroke. They have seen and talked with John numerous times since the stroke and are familiar with many, but not all, of the problems he is facing today.

Chris Ruffino, who is John Ruffino's son  
3541 E. Commerce Road  
Commerce, MI 48382  
(248) 402-3343

Chris has knowledge of John's condition before and after the stroke.

Deborah Langston, who is Martha Ruffino's best friend  
922 W. Water Street  
Mayfield, KY 42066  
(270) 970-8886

On the day of the stroke, Deborah came to the hospital and stayed with Martha the whole time John was in the hospital and at Saint Thomas Rehab.

Shane Crothers, who is John Ruffino's step-son  
2730 Mulberry Drive  
Clarkston, MI 48348  
(248) 917-2391

Joseph Crothers, who is John Ruffino's step son  
5021 Waldon Road  
Clarkston, MI 48348  
(248) 431-0474

David Crothers, who is John Ruffino's step son  
684 Stetson Road  
Kenduskeag, ME 04450  
(248) 770-8702

Shane, Joseph, and David have knowledge of John's condition before and after the stroke.

Gordon Lee, who was John Ruffino's boss  
Resides in Clarksville, TN  
(615) 509-6512

On the day of the stroke, Gordon was called by an employee of Home Depot in Smyrna, TN where John just picked up a delivery. He stated something was wrong with John. Martha called John and he stated something was wrong. Martha told John to pull over and Martha called the police and the police called EMS. EMS took John to StoneCrest Medical Center in Smyrna, TN.

Joe Marrone, worked with John Ruffino  
1126 Pickle Knight Road  
Joelton, TN 37080  
(347) 804-2984

Joe rode in the truck with John for a couple of weeks while training him.

List of Physicians

Adrian Alberto Jarquin-Valdivia, M.D.  
2400 Patterson Street, Suite 32  
Nashville, TN 37203  
(615) 348-6840

This was the first physician the Plaintiffs remember John saw at Centennial Medical Center in February 2016. He also told them to never take John to StoneCrest Medical Center again because John's outcome never should have happened.

Marie Dugas, M.D.  
2400 Patterson Street, Suite 32  
Nashville, TN 37203  
(615) 342-6840

John's current physician. She is Dr. Jarquin-Valdivia's partner at Centennial Medical Center.

Andre Olivier, M.D.  
100 Physicians Way, Suite 300  
Lebanon, TN 37090  
(615) 449-6868

Dr. Olivier treated John following his stroke, including treatment was for high blood pressure and swelling in his right leg and arm.

Kimberly Rivers, FNP-C  
Neighborhood Health  
217 East High Street, Suite 200  
Lebanon, TN 37090  
(615) 227-3000

Nurse Practitioner who treated John following his stroke.

Jeffrey Carrico  
318 S. Seventh Street  
Mayfield, KY 42066  
(270) 251-3223

Family physician who John is seeing following the Plaintiffs' move to Kentucky.

Rule 26(a)(1)(ii) Disclosures

Pursuant to Rule 26(a)(1)(ii), attached are documents regarding medical records, medical expenses and out-of-pocket expenses.

### Rule 26(a)(1)(iii) Disclosures

The Plaintiffs do not currently have computations for the categories of damages claimed in the lawsuit. With regard to medical expenses, documents have been produced with these disclosures that details some paid medical expenses, but the compilation of the medical bills that document already-paid medical expenses has not been completed.

The medical records that have been produced document the nature and extent of the injuries suffered related to the stroke.

The Plaintiffs' current understanding is that the following items will be needed as a result of John's needs and injuries related to the stroke, but computations regarding the cost of these items has not yet been determined:

#### What John Needs

- A hospital bed for use at home
- A walk-in shower that is big enough for a shower chair
- A lift chair
- Physical therapy for the remainder of his life
- Adult pull-ups and adult diapers – John is required to wear 24/7 due to accidents

#### What John Already Has

- A wheelchair with right arm lift
- A quad cane for walking

Respectfully submitted,



**Brian Cummings, #19354**

**Brian P. Manookian, #26455**

**Afsoon Hagh, #28393**

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*Attorneys for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that on July 3, 2017, a copy of this document was provided via email, with corresponding Rule 5 fax being sent simultaneously, to the following:

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